

1 2 3 4 5 6 7 8	George M. Kraw (SBN 71551) Katherine A. McDonough (CA Bar No. 241426) Donna L. Kirchner (SBN 138320) KRAW AND KRAW LAW GROUP 605 Ellis Street, Suite 200 Mountain View, CA 94043 Telephone: (650) 314-7800 Facsimile: (650) 314-7899 gkraw@kraw.com kmcdonough@kraw.com dkirchner@kraw.com Counsel for Plaintiffs Carpenters Pension Trust Fund for Northern California; and Board of Trustees, Carpenters Pension Trust Fund for Northern California		
	INITED CTATES DISTRICT COURT		
10	UNITED STATES DISTRICT COURT		
11	NORTHERN DISTRICT OF CALIFORNIA		
12	SAN FRANCISCO / OAKLAND DIVISION		
13	CARPENTERS PENSION TRUST FUND) Case No.: C13-1063 SC FOR NORTHERN CALIFORNIA, et al.,		
14	STIPULATION AND [PROPOSED] ORDER Plaintiffs, Plaintiffs, Plaintiffs,		
15) DISCOVERY LETTER		
16	v.) Honorable Donna M. Ryu		
17	LINDQUIST FAMILY LLC, et al.,		
18	Defendants.)		
19			
20	WHEREAS on April 11, 2014, this court issued an order in which Judge Ryu directed		
21	Ms. Bockmiller to produce redacted copies of certain documents by 5:00 p.m. on Monday, and		
22	providing that "if there are any disputes about these documents, the parties shall meet and confer and		
23	file a joint discovery letter by close of business on 4/18/2014," and		
24	WHEREAS Ms. Bockmiller timely produced the redacted documents, and		
25	WHEREAS Plaintiffs believe too much information was redacted from the documents; and		
26	WHEREAS this court previously granted a stipulation and order extending the deadline for		
27	submitting any further joint discovery letter to April 30, 2014, and		
28	WHEREAS the parties met and conferred, and Ms. Bockmiller, through her counsel, has		

Case 3:13-cv-01063-SC Document 64 Filed 04/30/14 Page 2 of 3

1	agreed to unredact portions of the do	ocuments that were originally redacted, and	
2	WHEREAS the parties need	additional time for Plaintiffs' counsel to review the copies of the	
3	less-redacted documents after they a	are produced in order to determine whether a further meet and	
4	confer, and possibly a further joint discovery letter, are necessary,		
5	THEREFORE,		
6	The parties hereby stipulate	and jointly request that the deadline for submitting the joint	
7	discovery letter be extended from April 30, 2014 to May 9, 2014.		
8	DATED: April _29_, 2014	KRAW & KRAW LAW GROUP	
9			
10		By: <u>/s/ Donna Kirchner</u> DONNA L. KIRCHNER	
11		Attorneys for Carpenters Pension Trust Fund for Northern California; and Board of Trustees, Carpenters Pension Trust	
12		Fund for Northern California	
13			
14	DATED: April _29_, 2014	McINERNEY & DILLON	
15			
16		By: <u>/s/</u> NEIL H. BUI	
17		Attorney for Defendants Lindquist Family LLC and Elsie Lindquist, and for non-party Lauren Bockmiller	
18			
19	For good course shown IT IC CO OF		
20 21	For good cause shown, IT IS SO OF Dated: 4/30/2014	KDEKED.	
22	Dated: 4/30/2014		
23		Hon. Johna M. Ryu UNITED STATES MAGISTRATE JUDGE	
24		ONTED STATES WANGISTRATE JODGE	
25			
26			
27			
28			

1	ATTESTATION
2	I, Donna L. Kirchner, attest that signatory Neil H. Bui has read and approved the foregoing
3	STIPULATION AND [PROPOSED] ORDER EXTENDING TIME TO SUBMIT JOINT DISCOVERY
4	LETTER and has consented to its filing in this action.
5	/s/ Donna Kirchner
6	Donna L. Kirchner
7	
8	
9	
10	
11	
12	
13	
14	
15	
16	
17	
18	
19	
20	
21	
22	
23	
24	
25	
26	
27	
28	